

1 RICHARD DOYLE, City Attorney (#88625)
2 NORA FRIMANN, Assistant City Attorney (#93249)
3 STEVEN B. DIPPELL, Sr. Deputy City Attorney (#121217)
4 Office of the City Attorney
200 E. Santa Clara Street
San Jose, California 95113
Telephone: (408) 535-1900

5 Attorneys for Plaintiff CITY OF SAN JOSE and
6 PEOPLE OF THE STATE OF CALIFORNIA

7 SUPERIOR COURT OF CALIFORNIA,
8 COUNTY OF SANTA CLARA

9
10 CITY OF SAN JOSE; PEOPLE OF THE
11 STATE OF CALIFORNIA; GINDIN-R&B
COMPANY

12 Plaintiff,

13 vs.

14 MARTIN & ROSANNA ALVAREZ, et al.,

15 Defendants.

NO. 1-96-CV 759667

**DECLARATION OF MOLLIE McLEOD
IN SUPPORT OF MOTION TO AMEND
INJUNCTIONS**

DATE: December 19, 2013
TIME: 9:00 a.m.
DEPT: 20
JUDGE: Kevin McKenney

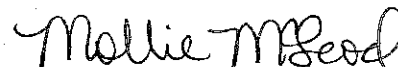
16
17
18 I, Mollie McLeod, declare as follows:

19 I am the Acting Division Manager for the Code Enforcement Division of the City of San
20 Jose's Department of Planning, Building and Code Enforcement, and I oversee Code
21 Enforcement efforts in the Santee neighborhood of the City.

22 On February 19, 2013, I attended a meeting for the tenants of the apartment buildings
23 subject to the injunctions in the Santee neighborhood along with other City of San Jose
24 personnel. Among other things, the tenants present were told that the City intends to ask the
25 court to amend the injunctions, given information about how to report any problems that
26 arise, and encouraged to do so.

1 The City intends to monitor the impact of whatever modifications to the injunctions are
2 made. The City's Code Enforcement inspectors conducted inspections of all the properties
3 subject to the injunctions between 2011 and 2013, so the condition of the properties prior to
4 the proposed modifications is known. Periodic random inspections will be conducted in the
5 neighborhood to locate and address any deteriorating conditions, and identify any property
6 owners who appear unable to properly maintain their properties. As appropriate,
7 enforcement actions will be initiated against those property owners under the proposed
8 Amended Injunction and/or other applicable standards such as the San Jose Municipal
9 Code.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct and, if called as a witness, I would testify to the same. This
12 declaration was executed in San Jose, California, on October 7, 2013.

13 
14 MOLLIE McLEOD
15
16
17
18
19
20
21
22
23
24
25
26
27
28